

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

**GARY GOFF, on behalf of
himself and all others similarly
situated,** §

Plaintiff, §

v. § **Case No.: 7:09-cv-00147-TMP**

**LASALLE BANK, N.A., as
Trustee for the MLMI Trust
Series 2006-RM4,** §

Defendant. §

UNOPPOSED MOTION TO EXTEND TIME

COMES NOW the Defendant, LaSalle Bank, N.A., as Trustee for the MLMI Trust Series 2006-RM4 (“LaSalle”), and, with the express permission of Gary Goff, respectfully submits the following Unopposed Motion to Extend Time:

1. Plaintiff has propounded discovery requests (Requests for Admissions, Interrogatories, and Requests for Production of Documents) to LaSalle.

2. Said discovery requests seek information and/or documents pertaining to the putative class and class action allegations Plaintiff has stated in this litigation.

3. However, LaSalle has pending before this Court a Motion to Strike the class allegations.

4. The parties agree that LaSalle's time for responding to said discovery requests should be extended while LaSalle's Motion to Strike the class allegations remains pending, as an Order granting said Motion would moot said discovery requests.

5. Thus, Plaintiff does not oppose LaSalle's request that the deadline for LaSalle to respond to the pending discovery requests be extended until thirty (30) days after the Court rules on LaSalle's pending Motion to Strike the class allegations in this matter.

WHEREFORE, PREMISES CONSIDERED, LaSalle respectfully requests that this Court will enter an Order extending LaSalle's deadline to respond to all outstanding discovery requests until thirty (30) days after the Court rules upon LaSalle's pending Motion to Strike the class allegations in this matter. LaSalle further requests such additional and appropriate relief to which it is entitled.

Respectfully submitted,

/s/ Kerry P. McInerney
Kerry P. McInerney
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OF COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify on this the 26th day of May, 2009 that a true and correct copy of the above and foregoing was filed with the CMECF which will cause a copy to be served on all counsel of record as follows:

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